

**REMARKS/ARGUMENTS**

In this Action, the Examiner rejected all claims under 35 U.S.C. §102(e) over U.S. patent number 6,108,711 (Beck et al.) This rejection is respectfully traversed.

Beck et al. describe a three-layer customer-interaction network operating system for a multimedia communication center. The three layers are: an external media layer for managing media contacts between customers and the communication center, a work-flow layer for processing customer interactions and routing events to resources (agents), and an internal media layer for managing media contact with the resources. When viewed as a hierarchy of layers, the external media layer and the internal media layer are peer layers that are both overlayed by the work-flow layer. As compared against the three layers described in this application and recited in the claims, the internal and external media layers of Beck et al., together correspond to applicants' contact layer and a portion of the communications layer, while the work-flow layer of Beck et al. corresponds to the rest of applicant's contact layer and the business layer. In other words, Beck et al. partition functionality of the multimedia communication layer differently from applicants: Beck et al. partition the functionality into two hierarchical layers, and subdivide one of those layers into two peer layers. The definitions of applicants' layers as recited in applicants' claims do not correspond to the layers disclosed by Beck et al.

The Examiner asserted that Beck et al.'s "business-logic layer" corresponds to applicants' recited business layer, and referenced col. 13, lines 17-20 of Beck et al. for this proposition. The Examiner is mistaken. The referenced passage of Beck et al. relates to an agent-desktop client which is "a part of the CINOS [3-layer customer-interaction network operating system] overall architecture" (col. 12, lines 47-50). In other

words, the business-logic layer referred to in col. 13, lines 17-20, is not an additional layer, but is a part of the three layers of Beck et al. described above. Just as each of applicants' three layers is made up of a number of individual components (see Figs. 2, 8, and 11 of the application) so, too, are the layers of Beck et al.'s operating system, and the "business-logic layer" is one of these components (see Fig. 4 of Beck et al.)

To make the distinction between the business-logic layer of Beck et al. and applicants' business layer more evident, applicants have amended the claim recitation of the business layer to include "defining workflows of the [business] services via dialogs that are derived from business rules and use business data and data from the communications layer to determine the communications and parameters of the communications for the communications layer." There is no teaching in Beck et al. corresponding to dialogs, either in the description of the operating system and its layers in general or in the description of the business-logic layer at col. 13, lines 17-20 in particular. Other than stating that the object models of the business-layer represent contacts, interactions, knowledge-bases, event routing processes, and other system events, Beck et al., says nothing about the "business-logic layer" and its structure and functionality. An equivalent of applicants' dialogs is not disclosed.

So, for all of the stated reasons, Beck et al. cannot be said to anticipate applicants' claimed invention. In view thereof, applicants request that the Section 102(e) rejection of their claims as amended over Beck et al. be withdrawn.

The rejection having been properly addressed, applicants suggest that the application is now in condition for allowance. Applicants therefore request that the application be reconsidered and thereafter be passed to issue.

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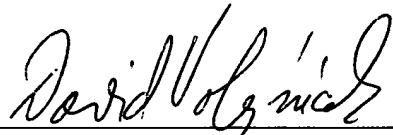
Amdt. Dated 18 May 2004

Reply to Office Action of February 26, 2004

Applicants consider the foregoing to be dispositive of all issues in the application. But if the Examiner should deem that a telephone interview would advance prosecution, applicants request the Examiner to call their attorney at the telephone number listed below.

Respectfully submitted,

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